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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ALICIA INES MOYA GARAY, JUAN
JAIME LOPEZ-JIMENEZ, and
ARRIBA LAS VEGAS WORKER
CENTER,

Plaintiffs,

vs.

CITY OF LAS VEGAS, a municipality;
MICHELE FREEMAN, in her official
capacity as City of Las Vegas Chief of
Department of Public Safety;
BANANTO SMITH, in his individual
capacity and official capacity as Deputy
Chief of Detention Services;

Defendants.

Case No. 2:20-cv-00119-GMN-EJY

**STIPULATION AND ORDER FOR
EXTENSION OF TIME**

(SECOND REQUEST)

1 Parties hereby respectfully stipulate, through their respective counsel, that the time for
2 Plaintiffs Alicia Moya Garay, Juan Lopez-Jimenez, and Arriba Las Vegas Worker Center to file a
3 reply in support of their Amended Motion for Summary Judgment [Dkt. 72], or, in the alternative
4 response in opposition to Defendants' Counter-motion for Summary Judgment [Dkt. 78], be
5 extended from March 14, 2022, to March 21, 2022.

6 On February 28, 2022, Defendants filed their count-motion for summary judgment [Dkt.
7 78]. Plaintiffs believe this should have been styled as an opposition to Plaintiffs' motion for
8 summary judgment, as explained in their motion to strike [Dkt. 79]. Defendants disagree.
9 Nevertheless, if Defendants' counter-motion is considered as a response in opposition, then
10 Plaintiffs' deadline to file a reply is March 14, 2022. Plaintiffs request additional time—7 days—
11 to file a reply, or response in opposition in the alternative, to March 21, 2022. Defendants do not
12 oppose this request.
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14 This is the second request for extension in this matter.
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1 DATED this 14th day of March, 2022.

2 MEXICAN AMERICAN LEGAL DEFENSE
3 AND EDUCATIONAL FUND

BRYAN K. SCOTT
City Attorney

4 By: /s/ Ernest Herrera
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By: /s/ Jeffrey L. Galliher
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Attorneys for City Defendants

11 **IT IS SO ORDERED.**

12 Dated this 14 day of March, 2022

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16 Gloria M. Navarro, District Judge
17 UNITED STATES DISTRICT COURT
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